

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA
DOCKET NO. 2023-9-E

In re:
Dominion Energy South Carolina,
Incorporated's 2023 Integrated
Resource Plan (IRP)

**SIERRA CLUB'S FOURTH SET
OF DATA REQUESTS
JULY 6, 2023**

Pursuant to R.103-833 of the South Carolina Code of Regulations, Intervenor Sierra Club, by and through undersigned counsel, serves the following data requests on Dominion Energy South Carolina, Inc. ("Dominion" or the "Company") in the above referenced docket. These requests are continuing in nature to the extent permitted by the rules of the South Carolina Public Service Commission and the South Carolina Rules of Civil Procedure.

INSTRUCTIONS

1. These requests should be regarded as continuing. If, after filing its initial response to the interrogatories and requests, the Company becomes aware of any information that would alter or amend any responses, please provide updated responses as additional information becomes available.
2. If a response to any of the attached requests requires any calculations, analyses, assumptions, or studies, please identify and provide copies of such calculations, analyses, assumptions, or studies—including all work papers relating thereto. For any analyses or calculations prepared using electronic workbooks, please provide operational versions of those spreadsheets as well as all operational versions of all supporting workbooks used to develop inputs.

3. Produced documents should include originals and all other copies which are not absolutely identical as well as all drafts and notes (whether typed, handwritten or otherwise) made or prepared in connection with such documents, whether used or not.
4. With respect to requests for analyses or calculations that were prepared using electronic workbooks, please provide operational versions of those spreadsheets (i.e., with calculations active) as well as all operational versions of all supporting workbooks used to develop inputs.
5. Unless otherwise specified, all requests for documents herein pertain to the Company's South Carolina operations. Please ensure that all responses are specific to the Company's South Carolina service territory. Where South Carolina-specific data are not available, please provide an appropriate factor, method or percentage to allow for an accurate estimate of South Carolina-specific data to be performed.
6. If you consider any document to be privileged or protected from production, then you must:
 - (i) include in your response a list of documents withheld from production, (ii) identify each document by date, addressee, author, title and subject matter, (iii) identify those persons who have seen the document or who were sent copies, and (iv) state the ground(s) upon which each such document is considered privileged or protected.
7. Responsive documents should be provided as they become available and should not be withheld until a complete response to all requests is available. Please deliver all responses to the following interrogatories and requests for production of documents **electronically** to:

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DEFINITIONS

1. The “Company” is defined to include both the Dominion Energy South Carolina, Inc. and any consultants or other agents that assisted in the development or preparation of the plan for electric distribution grid transformation projects.
2. “Communications” shall mean all oral communications and all written communications, including all “documents,” as defined below.
3. “Describe” means to state in detail each and every basis for the position taken or the statement made in response to the request and includes identifying each and every statement or document relied on and provide a copy of all such identified documents.
4. “Document” is defined to include all materials, of any kind or description, in any medium, regardless of where or how maintained or accessed (such as in or through official work or personal files, accounts, or devices). Documents include, by way of illustration only, correspondences, papers (including working papers), electronic mail (including any attachments), telegrams, facsimiles, notes, sound or video recordings, voice mail, minutes, memoranda, inter- or intra-office communications, diaries, daily logs, records, reports, studies, estimates, surveys, written forecasts, analyses, contracts, licenses, agreements, charts, graphs, indexes, database or other electronic records, statistical records, data sheets, data processing cards, computer printouts, computer discs, videotapes, motion pictures, agendas, meeting invitations, websites, intranet pages, and other electronic communications, any notes or drafts relating to any of the foregoing, and any other documents of any kind in your possession, custody or control or to which you have access or known to exist..

5. “Identify,” “identification,” as used with respect to a person means to state the person’s full name and present address and his present or last known employment position and business affiliation if a natural person, and corporate or other status and address if not a natural person. “Identify” or “identity” when used in reference to a document means to state the following as to each document:
 - a. Its nature and contents;
 - b. Its date;
 - c. The date it was executed if different from the date it bears;
 - d. The name, address and position of its author or signer;
 - e. The name, address and position of its addressee, if any;
 - f. Its present location and the name, present address and position of the person or persons having present custody; and
 - g. Whether it has been destroyed, and if so, with regard to such destruction; (i) the date of destruction; (ii) the reason for destruction; and (iii) the identity of the person who destroyed the document.
6. “Including” means “including but not limited to.”
7. “Person” includes any individual, sole proprietorship, partnership, corporation, association, trust, statutory trust, joint venture, or other entity.
8. “You” or “your” means Dominion and its agents, employees, representatives, attorneys, experts, investigators, insurers, consultants, or anyone acting on behalf of Dominion.

DATA REQUESTS

Please refer to the 2023 IRP at pages 25–26, 45 regarding Requests 4-1–4-4.

Request No. 4-1. Please list any load management tools, programs, and/or policies that the Company considered in determining the Summer Electric Vehicle (“EV”) peak load forecast of 358 MW.

- A. Did the Company consider load management tools such as Time of Use (“TOU”) rates to reduce the impact of EV charging on peak load? If so, how did the Company factor those tools into its modeling? If not, please explain why not.
- B. Did the Company consider any alternate rate structures to ensure that EVs charge during off-peak times?
- C. Did the Company’s EV load modeling incorporate any inputs that reflect those tools, programs, and/or policies? If so, what was the resulting impact on peak demand?

Request No. 4-2. Please provide all information, including but not limited to studies, reports, and/or other information that the Company reviewed or consulted in its EV load modeling, concerning how utilities are managing EV grid load to minimize grid strain and increases in overall demand.

- A. In conducting its modeling, did the Company review the 2020 study titled “Electric Vehicles are Driving Electric Rates Down,” prepared by Synapse Energy Economics, Inc.?¹

¹ <https://www.synapse-energy.com/sites/default/files/EVs-Driving-Rates-Down-8-122.pdf>

- B. Please identify the modeling inputs that reflect the empirical data from the studies, reports, and other information the Company reviewed or consulted in conducting its EV load modeling.

Request No. 4-3. Please identify any programs the Company has in place to provide charging infrastructure for EVs.

Request No. 4-4. How will the Company ensure that its buildout of the distribution and transmission infrastructure will be at a scale that can support the EV fleet as it exists now and as expected in 2030-2035?

Request No. 4-5. Refer to the 2023 IRP at page 20–21. The following requests relate to the National Electric Vehicle Infrastructure (“NEVI”) Program created by the Infrastructure Investment and Jobs Act (“IIJA”)²:

- A. Is the Company coordinating with the South Carolina Department of Transportation (“SCDOT”) to support the Alternative Fuel Corridors Funded by the NEVI program?
If so, please provide details on how that support and coordination is taking place.
- B. What role is the Company expecting to play in the buildout of the NEVI network?
- C. Is the Company expecting to receive IIJA NEVI funds from SCDOT to build out the NEVI network?
- D. Is the Company planning on building the transmission and distribution as needed to support the NEVI network?
- E. Is the Company expecting to seek contribution in aid of construction in its buildout of the electric infrastructure required to power the Alternative Fuel Corridors funded by

² Infrastructure Investment and Jobs Act, Pub. L. No. 117-58, Div. J, Tit. VIII (2021) (hereinafter “IIJA”).

the NEVI program? Is the Company considering waiving these contributions for any IIJA grant recipients, such as public fleets?

- F. What other actions is the Company taking to build out or support the buildout of the NEVI network?

Request No. 4-6. Refer to the 2023 IRP at page 20–21. The following requests relate to IIJA’s Charging and Fueling Infrastructure (“CFI”) resources³:

- A. Is the Company aware that IIJA provides for \$2.5 billion in discretionary grants for CFI to expand access to EV charging infrastructure within rural areas, low- and moderate-income neighborhoods, and communities with a low ratio of public parking spaces?
- B. What actions is the Company taking to support CFI grant applicants?
- C. How has the Company engaged with applicants to ensure that the recipients are able to satisfy any CFI program mandates or deadlines?
- D. What role does the Company anticipate playing with respect to the buildout of charging infrastructure under the CFI program?
- E. Is the Company planning on installing and owning or operating the CFI chargers themselves?
- F. Does the Company plan on requesting or receiving any contribution in aid of construction funds under the CFI program? If yes, is the Company considering waiving these contributions for any IIJA grant recipients, such as public fleets?
- G. What other steps is the Company taking to coordinate with and/or support state and local governments that apply for CFI resources?

³ IIJA § 11401.

H. Is the Company planning on supporting rural and underserved communities' applications for the CFI Resources discretionary grants? If so, please describe those plans.

Request No. 4-7. Refer to the 2023 IRP at page 20–21. The following requests relate to IJJA's Clean School Bus Program⁴:

- A. Is the Company aware that IJJA provides up to \$5 billion for local government entities to replace existing school buses with clean and zero-emission school buses?
- B. Is the Company aware that South Carolina recipients will receive over \$64 million under the Clean School Bus Program?
- C. Is the company aware that 16 school districts in South Carolina will receive Clean School Bus Program funding for 164 clean school buses?
 - a. Is the Company aware that the 16 school districts were prioritized because they are located in low income, rural, or Tribal land?
 - b. Has the Company determined which of those school districts are located within its service territory?
- D. How will the Company encourage off-peak charging of electric school buses?
- E. What steps is the Company taking to coordinate with and/or support state and local governments and/or school districts that applied for Clean School Bus Program funds?
- F. How has the Company engaged with recipients to ensure that recipients are able to satisfy any program mandates or deadlines?

⁴ IJJA § 71101.

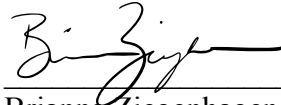
- G. What role does the Company anticipate playing with respect to the buildout of charging infrastructure under the Clean School Bus Program?
- a. Is the Company planning on building the transmission and distribution to support the buildout of charging infrastructure under the Clean School Bus Program?
 - b. Is the Company planning on installing or operating the chargers themselves?
 - c. Is the Company planning on seeking any contribution in aid of construction from entities receiving Clean School Bus Program funds? If so, is the Company considering waiving these contributions for any IIJA grant recipients?

Request 4-8. Refer to the 2023 IRP at page 20–21. The following requests relate to IIJA’s funds for the Congestion Mitigation and Air Quality Improvement (“CMAQ”) program⁵:

- A. Is the Company aware of the \$13.2 billion IIJA provides for the CMAQ program, which includes grant funding for the purchase of medium- or heavy-duty zero emissions vehicles and related charging equipment?
- B. What steps is the Company taking to coordinate with and/or support applicants for CMAQ funds?
- C. How has the Company engaged with applicants to ensure that the recipients are able to satisfy any program mandates or deadlines?
- D. What role does the Company anticipate playing with respect to the buildout of charging infrastructure under CMAQ?
- E. Is the Company planning on building the transmission and distribution to support the buildout of charging infrastructure under the CMAQ program?

⁵ IIJA § 11115.

- F. Is the Company planning on installing and owning or operating the chargers themselves?
- G. Is the Company planning on seeking any contribution in aid of construction from entities receiving CMAQ funds? If so, is the Company considering waiving these contributions for any IIJA grant recipients, such as public fleets?



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CERTIFICATE OF SERVICE

I hereby certify that I have served the persons listed on the official service list for Docket No. 2023-9-E, listed below, a copy of Sierra Club's Fourth Set of Data Requests via electronic mail on this day, July 6, 2023.

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Respectfully submitted this 6th day of July 2023.


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